

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HINESVILLE HOUSING AUTHORITY,
HINESHOUSE PROPERTY
MANAGEMENT AND MAINTENANCE
SERVICE, INC., HINESVILLE LEASED
HOUSING CORPORATION, and
MELANIE THOMPSON,

Defendants.

CASE NO.: 4:23-cv-00288-LGW-CLR

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER AND
STIPULATION REGARDING ELECTRONICALLY STORED INFORMATION**

Plaintiff United States and Defendants Hinesville Housing Authority, Hineshouse Property Management and Maintenance Service, Inc., Hinesville Leased Housing Corporation, and Melanie Thompson (“Defendants”) (collectively, the “Parties”) respectfully move for entry of the attached Joint Confidentiality Agreement and Protective Order (“Protective Order”) and Stipulation Regarding Electronically Stored Information (“ESI Stipulation”).

As to the Protective Order, the Parties respectfully maintain that good cause supports the entry of such an order in this Fair Housing Act case. Discovery in this case may involve the exchange of sensitive personal information regarding the Complainant Chakehisia Santos and her children, Defendant Melanie Thompson, and tenants and employees of the organizational Defendants, including information of a private nature that is covered by the scope of the Privacy Act of 1974, 5 U.S.C. § 552a. Discovery in this case may also involve financial, proprietary,

private and confidential information of the Parties and proprietary, private, and confidential information concerning non-parties.

As to the ESI Stipulation, the Parties have conferred and reached agreement regarding the terms on which electronically stored information will be produced, as well as the preservation and tracking of certain categories of privileged information. Accordingly, the Parties respectfully move for entry of this ESI Stipulation pursuant to Federal Rule of Civil Procedure 26(f).

WHEREFORE, the Parties respectfully request entry of the attached Protective Order and ESI Stipulation, and for any other relief deemed appropriate by the Court.

DATED: January 2, 2024

Respectfully submitted,

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